

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2002 DEC -2 P 2:20

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Northern Division

CLERK'S OFFICE
AT BALTIMORE
DEPUTY

KEVIN HARRIS

Plaintiff

v.

Case No.: JFM 2CV 236

CLUB HOLLYWOOD INC., et al

Defendants

* * * * *

CONSENT MOTION TO AMEND SCHEDULING ORDER

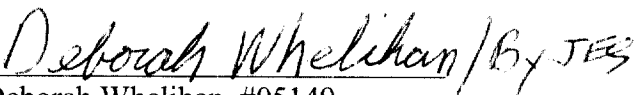
Plaintiff Kevin Harris by and through his attorneys John E. Smathers and McGowan, Cecil & Smathers, LLC, and Defendants Club Hollywood, Inc., et al., by and through their attorneys Deborah Whelihan and Jordan Coyne & Savits, LLP, files this Consent Motion to Amend Scheduling Order, and for reasons in support says:

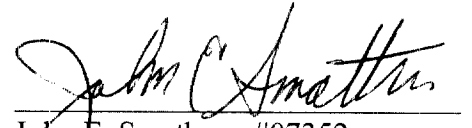
1. The Plaintiff brought this action against the Defendant alleging battery and negligence arising out of an incident that occurred between the plaintiff and Club Hollywood, its agents, servants, and/or employees.
2. That the parties have not exchanged written discovery and documents and have not yet taken the depositions of the Plaintiff, or the Defendant.
3. That an independent medical examination has been scheduled for the Plaintiff. The parties must also depose each other's experts.
4. The parties respectfully request this Honorable Court to amend the scheduling order by enlarging remaining deadlines by 120 days as follows:

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12/4/02

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|-----|---|----------------|
| (a) | Discovery Deadline
Submission of Status Report | March 28, 2003 |
| (b) | Requests For Admissions | April 3, 2003 |
| (c) | Dispositive Pretrial Motions | April 28, 2003 |

WHEREFORE, Plaintiff and Defendant respectfully request that the Consent Motion to Amend Scheduling Order be granted.


Deborah Whelihan, #05149
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McGowan, Cecil & Smathers, LLC
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